

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

SALLAMONDRA ROBINSON,
INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVE OF
THE ESTATE OF SHANQUELLA ROBINSON,
DECEASED.

)
)

Plaintiff,
v.)
)
E'MANI GREEN,) Case No.: 3:24-cv-01002
ALYSSE HYATT,)
MALIK DYER,)
WENTER DONOVAN,)
KHALIL COOKE,)
NAZEER TYREE WIGGINS,)
UNITED STATES DEPARTMENT OF)
STATE, AND THE)
FEDERAL BUREAU OF INVESTIGATION,)
)

Defendants.

/

PLAINTIFF'S OPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANT E'MANI GREEN'S MOTION TO DISMISS

Plaintiff, SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED, by and
through her undersigned counsel, hereby respectfully requests this Honorable Court for an
Extension of Time to Respond to Defendant E'Mani Green's Motion to Dismiss through
October 2, 2025 and states as follows:

1. On July 9, 2025, Defendant filed an Amended Answer to the Amended Complaint. (D.E. 59)
2. On August 18, 2025, Defendant's counsel submitted a brief to support Ms. Green's Motion to Dismiss. (D.E.63)
3. Plaintiff's counsel requests a 30-day extension to respond to Defendant's Motion to Dismiss.
4. Multiple agencies were hired to attempt service on Defendant Green, and Undersigned aims to include additional supporting documents from these agencies in response to Defendant's motion.
5. In light of the upcoming holiday weekend, Undersigned anticipates delayed responses.
6. Additionally, Plaintiff's Counsel was previously scheduled to travel from August 29, 2025 to September 1, 2025 and again from September 4, 2025 to September 8, 2025.
7. Undersigned seeks this extension in good faith and there will be no prejudice to the Defendant.
8. Plaintiff's counsel attempted to confer with the Defense counsel for E'Mani Green. Defense counsel objects to any extension of time.

WHEREFORE, Plaintiff, SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED, respectfully requests this Court grant a thirty (30) day extension of time to Motion to Dismiss, and all other relief this Court deems just and proper.

CERTIFICATE OF GOOD FAITH CONFERENCE

Undersigned Counsel certifies that the undersigned has conferred with Counsel for Defendant E'Mani Green.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 28, 2025, a true and correct copy of the foregoing was furnished via electronic mail to all of attorneys of records through the CM ECF portal.

Respectfully submitted,

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